



Your Auto Repair Business



An Environmental Compliance & Pollution Prevention Checklist

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Questions? ... Maine DEP Small Business Assistance Program
toll-free: 1-800-789-9802

Introduction

Good practices in your business do get noticed. Customers appreciate businesses that are clean, efficient, and effective with their work and services. Employees also appreciate an organized, clean, and safe work area. And regulatory compliance inspectors will quickly determine how your business practices measure up.

There is always room for improvement. The following checklist will help you evaluate your business practices to be in environmental compliance and exercise pollution prevention. The checklist information will also give you a way to make adjustments to reach a higher level of performance and save money. Look at how your business compares and determine how you can improve it.

This guidebook (drafted in July, 2004) is for assistance with handling of typical materials and wastes associated with automotive repair and maintenance. If you have more specific questions or would like additional information, please contact DEP and the Small Business Assistance Program at the numbers or addresses below.

We appreciate your comments and/or suggestions for improving this information. Thank you.

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Gasoline

Safe handling of gasoline to prevent explosion and fire is paramount. So is proper handling to protect against spills. Gasoline (and its many constituents) move very quickly through groundwater and can contaminate drinking water wells and natural resources. We must do what we can to prevent accidents and spills. Proper container storage with appropriate labeling to promote safe handling and minimize the likelihood of a spill is necessary. As wise Benjamin Franklin is quoted, “an ounce of prevention is worth a pound of cure.”

Gasoline that can not be used or reused, such as gasoline mixed with water, oil, rust, and other contaminants, must be segregated and handled as a hazardous waste. Gasoline fuel removed from vehicles during auto repair services may be suitable for use/reuse and returned to the vehicle, thereby avoiding waste and more costly handling. Proper containers and storage, and safe handling, is always necessary.

- ❑ Does your business have safe procedures and storage for handling of gasoline?
- ❑ Are any non-waste gasoline containers appropriately labeled and handled for safe use?
- ❑ Is gasoline stored away from ignition sources such as stoves and welding equipment?
- ❑ Is waste gasoline appropriately segregated, labeled as “Hazardous Waste”, and stored in properly grounded containers on an impermeable surface with spill containment? Containers must be non-leaking and the storage must conform to both hazardous waste requirements and local fire codes.
- ❑ Have you contacted a Maine-licensed hazardous waste contractor for transportation and disposal of waste gasoline?
- ❑ Have you reviewed the requirements for hazardous waste management in Maine’s Handbook for Hazardous Waste Generators? (See page nine for small quantity generators.)

Waste Oil & Oil Filters

State regulators in Maine may call it “waste oil” and it has a regulatory definition. However, it may not have to be devalued to simply a waste category. It may be more accurately referred to as “used” oil and if it meets “specification,” can be reused for fuel and heat production in a used oil burner. “Waste oil” may include vehicle crankcase oils, hydraulic or transmission fluids, industrial lube oils, and diesel fuel not used for parts cleaning. If it can’t be reused and is truly a waste, then it will cost your business for proper handling and disposal. To minimize your costs, avoid cross-contamination, especially with gasoline, brake cleaner and other hazardous solvents. Waste oil contaminated with these hazardous materials becomes a larger quantity of hazardous waste. More hazardous waste is more costly to handle and includes more regulatory burden.

Challenge yourself to manage the oil that your business generates in the most environmentally sound and cost-effective manner.

- ❑ Is waste oil segregated from other waste streams at the facility? (Be careful not to mix any gas, antifreeze, battery acid, or other materials with the oil.)
- ❑ Is waste oil stored in tanks, containers, or other secure containers (with secondary containment, for spill protection) for safe handling and ease of use and/or disposal? Please note that storage (in aggregate) of more than 1,320 gallons of “oil” threshold - which includes gasoline- requires development of an SPCC plan.
- ❑ Has your business evaluated a “waste oil” fueled heating system for possible use at the business facility?
- ❑ Is your waste oil transported off site by a licensed waste oil transporter for proper handling (EPA requirements)?
- ❑ Is your business prepared for an oil spill? Do you have proper containment around any storage containers, and handy absorbents to respond quickly to the spill event? Note: Call 1-800-482-0777 (State of Maine, DEP) if you have a spill for proper reporting procedure.
- ❑ Are used oil filters, hot-drained for 12-24 hours following removal, to ensure as much oil as possible is removed from the filter?

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Antifreeze

When good antifreeze must be removed for repair purposes, save it, and return it to the system after the repairs have been completed. Used antifreeze may be reused. It should be stored in a separate container and clearly labeled “useable antifreeze.” It may be especially valuable just before cold weather driving conditions.

If antifreeze is no longer usable, consider recycling it. On-site recycling may be an option, or you can contract with a recycling service. If it can’t be recycled, then contact a licensed hazardous waste transporter for waste disposal. Don’t mix it with other fluids or wastes! Cross-contamination will make it less suitable for future recycling and a larger quantity of more costly hazardous waste.

- ❑ Does your business generate “used” and/or “waste” antifreeze?
- ❑ Are your business waste streams segregated, and containers appropriately labeled “used” and “waste” for proper identification and handling?
- ❑ Are containers in good condition?
- ❑ If you do generate waste antifreeze, do you have it shipped off site for recycling or proper disposal with a legitimate service contractor?

Parts Cleaner

Parts cleaners may be grouped into three categories. First, there is the traditional solvent type unit, typically a sink-top style system, using solvents that contain mineral spirits or other VOC solvents for cleaning purposes. VOC containing units contribute to the formation of ground level ozone, and require registration and operation under Maine regulations. Many solvents type cleaners are also hazardous due to their flash point and may become hazardous due to metals from the parts cleaned. A second category is characterized as an aqueous detergent type unit that also offers labor savings by operating like an automatic “dish-washer.” A third category is the bioremediation parts washer. This type of unit is also a sink top style using a heated biodegradable detergent bath that both cleans parts and supports living microbes that feed off the oils and greases removed from the parts. This design provides a “self-cleaning” system with minimal maintenance when properly used.

Avoid cross-contamination with aerosols, chlorinated solvents, and other solvents or products that would make it hazardous.

- ☐ Does your business use a parts washer described in the above categories?
- ☐ Are alternatives to cleaning with liquid parts cleaners fully utilized (for purposes of waste and cost reduction?) These include physical cleaning with rags, towels, wire brushes, etc.
- ☐ If a liquid parts cleaner is required, has your business evaluated the use of non-VOC, non-chlorinated solvent containing parts cleaners?
- ☐ If you have a solvent cleaner, is the liquid flash point considered hazardous (less than 140 degrees F.)? (Remember to keep the container lid closed, protect from sources of sparking like electrical lighting, and properly label the chemicals used.)
- ☐ Contact a licensed hazardous waste transporter for proper handling of hazardous wastes from parts cleaners.

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Rags and Absorbents

These are materials used for general maintenance and spill clean up. Rags may be used to wipe down parts, etc. Sorbent boom and pads are used for collecting oil from spill events. If you handle materials that become classified as hazardous wastes with rags then this combination of things will also require handling as a hazardous waste. Prevent hazardous waste from accumulating by minimizing the volume that is generated, and by segregating your wastes. Better still, don't use unnecessary chemicals and processes that create hazardous waste to begin with. This is pollution prevention and it saves your business money too.

Painted floors for quick squeegee clean up, as well as pans, or other containment devices can reduce the need for using sorbent materials like speedy dry and other supplies. Of course, these sorbent materials require handy storage for quick use and require proper disposal after use. Everyone will appreciate an easy-to-clean floor surface.

- ❑ Are rags (or wipes) that have been used for cleaning laundered for reuse or properly disposed of as a solid waste? (Note: These cleaning rags must be essentially dry with no free flowing or dripping liquids and have flashpoint less than 140 degrees F.) Don't launder rags if the wastewater goes to a septic system.
- ❑ Rags, sorbents, pads, used to clean up spills of hazardous waste are considered "residues" and require handling as hazardous waste (in accordance with Maine's Hazardous Waste Management Regulations.)
- ❑ Use drip pans when removing fluids to keep the generation of sorbents (rags, pads, speedy dry, etc.) to a minimum.
- ❑ Consider coating your floor surface for easy clean up of fluids. Using squeegee or other similar implements can easily capture any spilled materials with minimal spread of liquids and use of sorbents.
- ❑ In the case of an oil spill, petroleum-contaminated sorbents (rags, pads, speedy dry materials, etc.) require handling as a 'special waste' and disposal at a properly licensed facility. Contact the DEP Spill response phone number **1-800-482-0777** to properly report the spill and receive guidance on handling the volume and type of waste.

Floor Drains

Does your business have a floor drain? Do your business practices *require* a floor drain? If not, you may be better off by removing or filling them. Proper disposal of water and contaminants collected from a floor drain may add unnecessary management, costs, and future liability concerns to your business expenses. Elimination of unnecessary floor drains is your best management practice.

A compliance inspection of your business will raise the following questions.

- ❑ Does your business facility contain any floor drains that have not been sealed or removed?
- ❑ Are activities in the drainage of any floor drain areas properly restricted? For example, vehicle washing activities which properly utilize a floor drain and subsurface wastewater disposal system, must be located in a separate bay from vehicle maintenance activities or chemical storage areas.
- ❑ Are all floor drains in areas where engine maintenance is performed sealed, connected to the municipal sewer, or connected to a holding tank?
- ❑ Are floor drains sealed in areas where you store petroleum products, antifreeze, solvents and paints?
- ❑ If you have an oil/water separator, do you have a maintenance plan to ensure that it is cleaned out regularly?
- ❑ Has your business investigated alternatives to floor drains? Some auto repair bays have painted and sealed concrete floors that provide a neat and easy-to-clean work surface. It's easy to clean up (just by using a squeegee) small spills too.

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Batteries

Used lead acid batteries are generated from normal servicing on vehicles. They contain both lead and sulfuric acid. Intact batteries (those not cracked or leaking) may be returned to battery distributors in connection with new battery purchases. Don't unnecessarily store used lead acid batteries.

Cracked or leaking lead acid batteries are considered hazardous waste and require appropriate handling. *Prevent* this waste handling cost by properly storing your batteries to maintain them intact.

- ❑ Does your business generate used batteries from motor vehicle servicing?
- ❑ Whenever possible return your batteries for recycling as soon as possible. Provide a secure location (preferably with containment) for batteries that accumulate on site and protect them from freezing, which can cause breakage.
- ❑ Store batteries upright, under cover, and on an impermeable bermed surface/container in order to detect and contain leaks. Avoid stacking to prevent damage from falling.
- ❑ Cracked and leaking (non-intact) batteries require disposal as "hazardous waste" because of the liquid sulfuric acid and lead content. This may be a preventable expense if used batteries are properly stored in a secure location until they are taken for recycling. These batteries can not be burned or disposed of as solid waste.
- ❑ Choose a licensed battery recycler.

Miscellaneous

❑ **Universal Waste:**

Mercury containing light bulbs, such as those in fluorescent lighting, motor vehicle switches with mercury, and other mercury containing products must be stored and handled in accordance with State of Maine Universal Waste Rules (Chapter 850, Section 3A.) The Handbook for Universal Waste (Jan. 2004) provides information to help you with these responsibilities. Contact our DEP and SBAP for a free copy or access on line too.

❑ **Workplace Health & Safety:**

Safetyworks! provides free assistance for small businesses with interest in compliance and maintaining a healthy and safe work environment. This “sister” program in our Maine Department of Labor provides free information and on-site services for your benefit, without enforcement inspectors. Contact phone number: 207-624-6400.

❑ **Energy Assistance:**

Our Public Utilities Commission (PUC) offers energy conservation assistance services as part of its Small Business Program. Contact phone number: 866-376-2463 or web site: www.state.me.us/msep/small_business_program.htm.

❑ **Training:**

Have you and your employees viewed the training video *The Right Way Managing Auto Fluid Wastes & Parts Cleaning*? This brief (15 minute) training video featuring two Maine businesses is available free from Maine DEP and their Small Business Assistance Program.

...“Reduce the wastes that your business generates, and properly store and dispose of those wastes that you must handle. Make these practices second nature.” -Gary Kirkpatrick, owner, Kirkpatrick’s Service Inc., Augusta

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